

EVE H. WAGNER (State Bar No. 126471)
ANTHONY D. SBARDELLATI (State Bar No. 246431)
SAUER & WAGNER LLP
1801 Century Park East, Suite 1150
Los Angeles, California 90067
Tel: (310) 712-8100; Fax: (310) 712-8108
E-mail: ewagner@swattys.com; asbardellati@swattys.com

JEREMY FEIGELSON (*of counsel*)
BRUCE P. KELLER (*of counsel*)
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, New York 10022
Tel: (212) 909-6000; Fax: (212) 909-6836
Email: jfeigelson@debevoise.com; bpkeller@debevoise.com

Attorneys for Defendant Prometheus Global Media, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

PENSKE MEDIA CORPORATION,
dba PMC, a Delaware corporation,

Plaintiff,

v.

PROMETHEUS GLOBAL MEDIA,
LLC, a Delaware limited liability
company d/b/a hollywoodreporter.com;
and DOES 1 through 10, inclusive,

Defendants.

Case No.: CV 11-7560-JST (MRW)
Hon. Josephine Staton Tucker
Magistrate: Hon. Michael R.
Wilner

**DISCOVERY MATTER:
DECLARATION OF MANISH M.
SHAH IN OPPOSITION TO PENSKE
MEDIA CORPORATION'S
MOTION RE: FURTHER
RESPONSES TO WRITTEN
DISCOVERY PROPOUNDED TO
DEFENDANT PROMETHEUS
GLOBAL MEDIA, LLC**

**JOINT STIPULATION AND
[PROPOSED] ORDER (filed
concurrently)**

Action filed: September 14, 2011
Trial Date: July 9, 2013

Hearing Date:

1 Manish M. Shah declares:

2 1. I am an employee of defendant Prometheus Global Media, LLC
3 ("Prometheus"), where I have been employed since June 2010 in the area of computer
4 services. My job title is Director of Development. Prometheus owns a number of media
5 properties, including The Hollywood Reporter ("THR"), Billboard and Adweek. My job
6 duties include working on and managing the development of the websites for these media
7 properties. Through my job I am generally familiar with how Prometheus runs the
8 technical side of these websites. I make this declaration on personal knowledge.
9

10 2. In July and August 2011, Prometheus developed a "carousel" feature for the
11 THR website, www.hollywoodreporter.com. A carousel is a common website feature
12 that causes a series of articles or pictures to rotate through a display window on the
13 homepage. The carousel was a small project, involving the addition to the THR site of a
14 small amount of code. For small projects such as this, Prometheus typically does not
15 create any specific budget, and we did not do so in this case. The project was assigned to
16 Irfan Ali of Nihaki Systems, an outside contractor. Mr. Ali worked with Prometheus
17 from approximately October 2010 to September 2011. During that time, Mr. Ali worked
18 on a daily or near-daily basis on a range of projects for various websites.
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20 3. From approximately June 2010 through October 2010, Prometheus engaged
21 in a project to broadly redesign and relaunch the THR website. This was a much larger
22 project than the later work on the carousel. It involved a different contractor and did not
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1 involve Mr. Ali or Nihaki Systems. The budget for the overall revamping of the THR
2 website was in the seven figures.

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4 4. Prometheus employs many personnel who provide services related to its
5 websites. Prometheus also has regularly hired, and continues to hire, a number of
6 external vendors to work on various website-related projects.
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9 I declare under penalty of perjury under the laws of the United States and California that
10 the foregoing is true and correct.

11 Signed November 21, 2012 at New York, New York:
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15 Manish M. Shah
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